IDEQ

General Comments

1. The Record of Decision (September 1995), based on the available information at that time, states that in *Section 9.6 Potential Changes to the Selected Remedy*, " It may become apparent, during the remedy (after implementation of source control and continued monitoring), that contaminant levels have ceased to decline and are remaining constant at levels higher than the remediation goal over some portion of the contaminated plume. In such case, the performance standards and/or remedy will be reevaluated". Subsequently, in Section 10.1 (Section 10, Statutory Determinations), it is stated that "Ground water modelling predicts that within ten years of implementation of the selected remedy (source control) levels of vanadium, molybdenum, arsenic, and manganese will achieve the health-based performance standards".

All the COCs just listed continue to exhibit concentrations above RBCs, but molybdenum and vanadium continue to show high concentrations considerably above above RBCs in the on-site, and especially the off-site and downgradient wells KM-15, KM-16, and KM-18. As noted in the specific comments below, and discussed in greater detail in Section 5.0 of this report, the trends in some cases show increases, especially for molybdenum. Although it is noted that in this and the prior annual groundwater reports, the exceedance of the RBC by both molybdenum and vanadium has been duly noted and discussed, and the projected compliance with the RBCs for these contaminants for select wells has been extended in time, the present concentrations (based on the 2006 sampling and reporting) remain cause for concern and warrant additional discussion as to the effectiveness of the remedy (especially in light of the next Five-Year Review due in September 2007).

Also, at this time the continued monitoring of Big Spring by both Tronox and Monsanto, and "City Park Spring" by Monsanto, indicate concentrations of molybdenum that continue to be found above the RBC. Although both Big Spring and City Park Spring appear to exhibit decreasing concentrations, levels are still above the RBC (180 ug/L) for the latest Tronox data and may indicate a surface water/groundwater connection that cannot be satisfactorily explained away by the discussion in Section 5.4.2 on pages 43 and 44, that states "…elevated molybdenum concentration at Big Spring may be related to factors affecting water quality not related to the TRONOX facility." It is not obvious, however, what these other factors might be that are affecting water quality. An obvious surface water impact, regardless of the status of the spring for domestic, or otherwise, use, should be evaluated and discussed in more detail.

2. There appears to be a noticeable increase in molybdenum and vanadium concentrations in the off-site wells, especially KM-16, since approximately May '05. Please explain if there is an event concurrent with this period that would account for this increase.

Specific Comments

1. Section 4.1, first paragraph, page 15

Please explain why background sampling has not been conducted since 1991.

2. Section 4.5.2, first paragraph, page 20, and Concentration vs Time graphs in Appendix A

There are still wells where manganese definitely appears to be increasing with time. For example, in KM-3, concentrations have increased from 320 ug/L in November '00, to 550 ug/L in May '06. In KM-6, concentrations have increased from 150 ug/L in November '04, to 300 ug/L in May '06, and in KM-8, concentrations have increased from 1800ug/L in November '04 to 4000 ug/L in May '06.

3. Section 4.5.3, page 20, and Molybdenum Concentrations vs Time graphs in Appendix A

It may be true that molybdenum concentrations indicate an overall decreasing trend with time; however, there appears to be recent increasing trends in select wells. KM-3 exhibits concentrations that are the same or slightly increasing since November '00 (approximately 6,500 ug/L in '00 to about 7,500 ug/L in May '06). KM-6 and KM-16 both exhibit increasing concentrations from approximately November '04 to May '06, i.e. 1200 ug/L to 2000 ug/L and 700 ug/L to 1200 ug/L, respectively. Both Big Spring and Finch Spring exhibit decreasing concentrations, but still show concentrations above the RBC of 180 ug/L.

4. Section 4.5.4, page 20, and Vanadium Concentrations vs Time graphs in Appendix A

Vanadium concentrations are high (substantially above the RBC) , as stated, in most on-site and off-site wells. Although most do show decreasing trends, two wells, KM-6 and KM-16, show recent increasing trends. KM-6 has increased form 3500 ug/L in November '04, to 6500 in May '06. Km-16 shows less dramatic but still increasing concentrations of from 2250 ug/L in May '05 to 3000 in May '06.